

# **EXHIBIT A-3**

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOSE CHUNG LUO, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SPECTRUM PHARMACEUTICALS, INC., et  
al.,

Defendants.

No. 2:21-cv-01612-CDS-BNW

CLASS ACTION

SUMMARY NOTICE OF PENDENCY AND  
PROPOSED SETTLEMENT OF CLASS  
ACTION

EXHIBIT A-3

1 **TO: ALL PERSONS OR ENTITIES WHO PURCHASED OR OTHERWISE ACQUIRED**  
2 **SPECTRUM PHARMACEUTICALS, INC. (“SPECTRUM”) COMMON STOCK**  
3 **BETWEEN MARCH 7, 2018, AND AUGUST 5, 2021, INCLUSIVE (THE “CLASS**  
4 **PERIOD”)**

5 **THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER**  
6 **SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.**

7 **YOU ARE HEREBY NOTIFIED**, pursuant to Rule 23 of the Federal Rules of Civil  
8 Procedure and an Order of the United States District Court for the District of Nevada (“Court”), that  
9 the above-captioned action (“Litigation”) has been certified as a class action, except for certain  
10 Persons and entities who are excluded from the Class by definition as set forth in the Stipulation of  
11 Settlement dated May 9, 2025 (“Stipulation”) and the detailed Notice of Pendency and Proposed  
12 Settlement of Class Action (“Notice”). The Stipulation and Notice can be viewed at  
13 [www.SpectrumPharmaceuticalsSecuritiesSettlement.com](http://www.SpectrumPharmaceuticalsSecuritiesSettlement.com).

14 **YOU ARE ALSO HEREBY NOTIFIED** that International Trading Group, Inc. (“Lead  
15 Plaintiff”), and defendants Spectrum, Joseph W. Turgeon, Kurt A. Gustafson, Francois J. Lebel, and  
16 Thomas J. Riga (“Defendants”) have reached a proposed settlement of the Litigation on behalf of the  
17 Class for \$15.95 million in cash (“Settlement”). If approved by the Court, the Settlement will  
18 resolve all claims in the Litigation.

19 **YOU ARE ALSO HEREBY NOTIFIED** that a hearing will be held on \_\_\_\_\_,  
20 2025, at \_\_: \_\_ .m., before the Honorable Cristina D. Silva at the United States District Court,  
21 District of Nevada, Lloyd D. George Federal Courthouse, 333 Las Vegas Boulevard South, Las  
22 Vegas, NV 89101, to determine whether: (1) the Settlement of the above-captioned Litigation as set  
23 forth in the Stipulation for \$15.95 million in cash should be approved by the Court as fair,  
24 reasonable, and adequate; (2) the Judgment as provided under the Stipulation should be entered  
25 dismissing the Litigation with prejudice; (3) to award Lead Plaintiff’s Counsel attorneys’ fees and  
26 expenses out of the Settlement Fund (as defined in the Notice) and, if so, in what amounts; (4) to  
27 award Lead Plaintiff its costs and expenses in representing the Class out of the Settlement Fund and,  
28 if so, in what amount; and (5) the Plan of Allocation should be approved by the Court as fair,  
reasonable, and adequate.

1 The Court may decide to change the date and/or time of the Settlement Hearing, conduct the  
 2 hearing by video or telephonic conference, or otherwise allow Class Members to appear at the  
 3 hearing by telephone or videoconference, without further written notice to the Class. It is important  
 4 that you check the Settlement website, [www.SpectrumPharmaceuticalsSecuritiesSettlement.com](http://www.SpectrumPharmaceuticalsSecuritiesSettlement.com),  
 5 before making any plans to attend the Settlement Hearing. Any updates regarding the Settlement  
 6 Hearing, including any changes to the date or time of the hearing or updates regarding in-person or  
 7 telephonic appearances at the hearing, will be posted to the Settlement website. Also, if the Court  
 8 requires or allows Class Members to participate in the hearing by telephone or videoconference, the  
 9 access information will be posted to the website.

10 IF YOU PURCHASED OR OTHERWISE ACQUIRED SPECTRUM COMMON STOCK  
 11 BETWEEN MARCH 7, 2018, AND AUGUST 5, 2021, INCLUSIVE, YOUR RIGHTS ARE  
 12 AFFECTED BY THE SETTLEMENT OF THIS LITIGATION.

13 To share in the distribution of the Net Settlement Fund, you must establish your rights by  
 14 submitting a Proof of Claim and Release form (“Proof of Claim”) by mail (**postmarked no later**  
 15 **than \_\_\_\_\_, 2025**) or electronically via the Settlement website (**no later than \_\_\_\_\_,**  
 16 **2025**). Failure to submit your Proof of Claim by \_\_\_\_\_, 2025, will subject your claim to rejection  
 17 and preclude you from receiving any of the recovery in connection with the Settlement of this  
 18 Litigation. If you are a Class Member and do not request exclusion from the Class (as described  
 19 below), you will be bound by the Settlement and any judgment and release entered in the Litigation,  
 20 including, but not limited to, the Judgment, whether or not you submit a Proof of Claim.

21 The Notice, which more completely describes the Settlement and your rights thereunder  
 22 (including your right to object to the Settlement), the Proof of Claim, the Stipulation (which, among  
 23 other things, contains definitions for the capitalized terms used in this Summary Notice), and other  
 24 important documents, may be accessed online at  
 25 [www.SpectrumPharmaceuticalsSecuritiesSettlement.com](http://www.SpectrumPharmaceuticalsSecuritiesSettlement.com), or by writing to:

26 *Spectrum Pharmaceuticals Securities Settlement*  
 27 Claims Administrator  
 c/o Verita Global  
 P.O. Box 301171  
 28 Los Angeles, CA 90030-1171

1           Inquiries should NOT be directed to Defendants, the Court, or the Clerk of the Court.

2           Inquiries, other than requests for the Notice or for a Proof of Claim, may be made to Lead  
3 Counsel:

4                               ROBBINS GELLER RUDMAN & DOWD LLP  
5                               Ellen Gusikoff Stewart  
6                               655 West Broadway, Suite 1900  
7                               San Diego, CA 92101  
8                               Telephone: 800/449-4900  
9                               settlementinfo@rgrdlaw.com

10           IF YOU DESIRE TO BE EXCLUDED FROM THE CLASS, YOU MUST SUBMIT A  
11 REQUEST FOR EXCLUSION SUCH THAT IT IS **POSTMARKED BY \_\_\_\_\_, 2025,**  
12 IN THE MANNER AND FORM EXPLAINED IN THE NOTICE. IF YOU PROPERLY  
13 EXCLUDE YOURSELF FROM THE CLASS, YOU WILL NOT BE BOUND BY ANY  
14 RELEASES, JUDGMENTS, OR ORDERS ENTERED BY THE COURT IN THE LITIGATION  
15 AND YOU WILL NOT RECEIVE ANY BENEFITS FROM THE SETTLEMENT. EXCLUDING  
16 YOURSELF FROM THE CLASS IS THE ONLY OPTION THAT MAY ALLOW YOU TO BE  
17 PART OF ANY OTHER CURRENT OR FUTURE LAWSUIT AGAINST DEFENDANTS  
18 CONCERNING THE CLAIMS BEING RESOLVED BY THE SETTLEMENT.

19           IF YOU ARE A CLASS MEMBER, YOU HAVE THE RIGHT TO OBJECT TO THE  
20 SETTLEMENT, THE PLAN OF ALLOCATION, THE REQUEST BY LEAD COUNSEL FOR AN  
21 AWARD OF ATTORNEYS' FEES NOT TO EXCEED 30% OF THE \$15.95 MILLION  
22 SETTLEMENT AMOUNT AND EXPENSES NOT TO EXCEED \$200,000, PLUS INTEREST ON  
23 BOTH AMOUNTS, AND/OR THE REQUEST FOR AN AWARD TO LEAD PLAINTIFF  
24 PURSUANT TO 15 U.S.C. §78u-4(a)(4). ANY OBJECTIONS MUST BE FILED WITH THE  
25 COURT AND SENT TO LEAD COUNSEL AND DEFENDANTS' COUNSEL **BY**  
26 \_\_\_\_\_, **2025,** IN THE MANNER AND FORM EXPLAINED IN THE NOTICE.

27 DATED:

28                               \_\_\_\_\_  
BY ORDER OF THE COURT  
UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA